

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

MOTION OFFENSE, LLC,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

§
§
§
§
§
§
§
§
§
§

CIVIL ACTION NO. 6:21-cv-00514-ADA

JURY TRIAL DEMANDED

JOINT CLAIM CONSTRUCTION STATEMENT

Pursuant to the Joint Proposed Scheduling Order (Dkt. 33), Plaintiff Motion Offense LLC and Defendant Google LLC submit this Joint Claim Construction Statement.

I. AGREED-UPON CLAIM TERMS

Term	Agreed Construction
“creation”	No construction is necessary.
“location”	No construction is necessary.
“criterion schema defining at least one of a format or a vocabulary”	No construction is necessary.
“attachment”	“a portion of a communication that includes data from one communicant to another other than data in the message portion”

II. DISPUTED CLAIM TERMS

A. ’353, ’737, AND ’215 PATENTS

Claim Term	Plaintiff’s Construction	Defendant’s Construction
“information associated with [the] at least one folder”	No construction is necessary.	“information previously connected to at least one existing folder”
“immediately follows”	No construction is necessary.	Indefinite

B. ’140 PATENT

Claim Term	Plaintiff's Construction	Defendant's Construction
"transform"	No construction is necessary.	Indefinite
"simultaneously"	No construction is necessary.	Indefinite

C. '507 PATENT

Claim Term	Plaintiff's Construction	Defendant's Construction
"security criterion"	No construction is necessary.	Indefinite

Google proposed each of the above terms.

DATED: March 22, 2022

/s/ Derek Dahlgren, with permission by
Michael E. Jones

Timothy Devlin
tdevlin@devlinlawfirm.com
Derek Dahlgren (*pro hac vice*)
ddahlgren@devlinlawfirm.com
Mariam Clayton (*pro hac vice*)
mclayton@devlinlawfirm.com
DEVLIN LAW FIRM LLC
1526 Gilpin Avenue
Wilmington, DE 19806
Tel: (302) 449-9010
Fax: (302) 353-4251

Attorneys for Plaintiff Motion Offense LLC

Respectfully Submitted,

/s/ Michael E. Jones

Michael E. Jones
State Bar No. 10929400
mikejones@potterminton.com
POTTER MINTON, P.C.
110 N. College Ave., Suite 500
Tyler, Texas 75702
Tel: (903) 597-83411
Fax: (903) 593-0846

Robert W. Unikel (*Pro Hac Vice*)
robertunikel@paulhastings.com
Daniel J. Blake (*Pro Hac Vice*)
danielblake@paulhastings.com
Grayson S. Cornwell (*Pro Hac Vice*)
graysoncornwell@paulhastings.com
PAUL HASTINGS LLP
71 South Wacker Drive, 45th Floor
Chicago, IL 60606
Tel: (312) 499-6000
Fax: (312) 499-6100

Elizabeth Brann (*Pro Hac Vice*)
elizabethbrann@paulhastings.com
Cole Malmberg (*Pro Hac Vice*)
colemalmberg@paulhastings.com
Ariell N. Bratton (*Pro Hac Vice*)
ariellbratton@paulhastings.com
PAUL HASTINGS LLP
4747 Executive Drive, 12th Floor
San Diego, CA 92121
Tel: (858) 458-3000
Fax: (858) 458-3005

Robert R. Laurenzi (*Pro Hac Vice*)
robertlaurenzi@paulhastings.com
PAUL HASTINGS LLP
200 Park Avenue
New York, NY 10166
Tel: (212) 318-6000
Fax: (212) 319-4090

Attorneys for Defendant Google LLC

CERTIFICATE OF SERVICE

I hereby certify that on the 22nd day of March, 2022, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to all counsel of record.

/s/ Michael E. Jones

Michael E. Jones